Mr. Bruce Korenstra
Orbit Composites, Inc. and Better Way Products, Inc.
70891 Court Road 23
New Paris, IN 46553

Re: 039-16519
First Significant Permit Modification to
Part 70 No.: T 039-15744-00570

Dear Mr. Korenstra:

Orbit Composites, Inc. and Better Way Products, Inc. was issued a Part 70 permit on June 26, 2002 for a recreational vehicle (RV) and Class C motor home manufacturing plant. A letter requesting changes to this permit was received on August 29, 2002. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the deletion of emission units permitted under Carriage Inc. (T 039-6326-00456) and the related permit conditions. A separate emissions limit and record keeping requirements have also been set for Volatile Organic Compounds (VOCs) for the fiberglass manufacturing operation permitted under Orbit Composites, Inc. and Better Way Products, Inc..

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
mm
cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Orbit Composites, Inc. and Better Way Products, Inc.
210 Wabash Street
Millersburg, Indiana 46543

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-15744-00570	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 26, 2002

1st Significant Permit Modification No. 039-16519	Pages Modified: 3, 4, 5, 27, 28, 29, 29a, 29b, 29c, 33
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

SECTION A **SOURCE SUMMARY**

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a recreational vehicle (RV) and Class C motor home manufacturing plant.

Responsible Official:	Bruce Korenstra, CFO
Source Address:	210 Wabash Street, Millersburg, Indiana 46543
Mailing Address:	70891 County Road 23, New Paris, Indiana 46553
SIC Code:	3716
County Location:	Elkhart
County Status:	Maintenance for ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices in Orbit Composites, Inc. and Better Way Products, Inc.:

Orbit Composites, Inc. and Better Way Products, Inc.

Building 14

(1) one (1) resin laminate coating application booth with a maximum capacity of 0.66 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F1 and F2;

(2) one (1) air-assisted airless gel coat coating application booth with a maximum capacity of 0.66 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F3 and F4;

Building 15

(3) one (1) resin laminate coating application booth with a maximum capacity of 0.80 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F8 and F9;

(4) one (1) air-assisted airless gel coat coating application booth with a maximum capacity of 0.80 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F6 and F7;

Building 16

(5) one (1) resin laminate coating application booth with a maximum capacity of 0.80

units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F10 and F11;

(6) one (1) resin vacuum laminate coating application system using roll coating system with a maximum capacity of 0.80 units per hour, and exhausting through three (3) stacks, identified as F15, F16 and F17; and

(7) one (1) air-assisted airless gel coat coating application booth with a maximum capacity of 0.80 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F12 and F13.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(1) three (3) natural gas-fired make-up air units, identified as H1A, H2A and H3A, each with a heat input rate of 3.025, 3.025 and 3.85 mmBtu/hr, respectively.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(1) It is a major source, as defined in 326 IAC 2-7-1(22).

(2) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Orbit Composites, Inc. and Better Way Products, Inc.

Building 14

(1) one (1) resin laminate coating application booth with a maximum capacity of 0.66 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F1 and F2;

(2) one (1) air-assisted airless gel coat coating application booth with a maximum capacity of 0.66 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F3 and F4;

Building 15

(3) one (1) resin laminate coating application booth with a maximum capacity of 0.80 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F8 and F9;

(4) one (1) air-assisted airless gel coat coating application booth with a maximum capacity of 0.80 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F6 and F7;

Building 16

(5) one (1) resin laminate coating application booth with a maximum capacity of 0.80 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F10 and F11;

(6) one (1) resin vacuum laminate coating application system using roll coating system with a maximum capacity of 0.80 units per hour, and exhausting through three (3) stacks, identified as F15, F16 and F17; and

(7) one (1) air-assisted airless gel coat coating application booth with a maximum capacity of 0.80 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F12 and F13.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 20-25]

(a) The total VOC emissions from the fiberglass manufacturing facilities are limited to 8.25 tons per month, including the catalysts and clean-up solvents.

(b) Pursuant to 326 IAC 20-25-3, until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors for gel coating shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. For operations not addressed by this reference, emission factors shall be

taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(c) Pursuant to 326 IAC 20-25-3, gel coats used shall be limited to a maximum monomer content of 44 percent (44%) by weight for clear production gel coats and 45 percent (45%) by weight for tooling gel coats, or their equivalent on an emissions mass basis. Production resin for specialty products shall be limited to a maximum monomer content of 48 percent (48 %) by weight, and tooling resin shall be limited to a maximum monomer content of 43 percent (43 %) by weight. Compliance with these monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during the month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified is sufficient for demonstrating compliance with the HAP monomer content limits.

(d) Pursuant to 326 IAC 20-25-3, the following categories of materials shall be applied using mechanical non-atomized application technology or manual application:

(1) Production non-corrosion resistant, unfilled resins.
(2) Production, specialty product resins.
(3) Tooling resins used in the manufacture of watercraft.
(4) Production resins used for Class I flame and smoke product.

All other gel coat application and mechanical application of resins shall be by any of the following spray technologies:

(1) Non-atomized application technology.
(2) Air-assisted airless.
(3) Airless.
(4) High volume, low pressure.
(5) Equivalent emission reduction technologies to (2) through (4).

(e) The work practice, cleaning, and training standards required pursuant to 326 IAC 20-25 as specified in Condition D.1.2 shall be followed.

D.1.2 Styrene [326 IAC 20-25]

The following shall apply to the reinforced plastic composites open molding process:

(a) Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

(1) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.

(2) Except for mixing containers as described in item (7), HAP containing materials shall be kept in a closed container when not in use.

(3) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.

(4) Solvent collection containers shall be kept closed when not in use.

(5) Clean-up rags with solvent shall be stored in closed containers.

(6) Closed containers shall be used for the storage of the following:

(A) All production and tooling resins that contain HAPs.
(B) All production and tooling gel coats that contain HAPs.

(C) Waste resins and gel coats that contain HAPs.
(D) Cleaning materials, including waste cleaning materials.
(E) Other materials that contain HAPs.

(7) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

(b) Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

(1) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.

(2) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.

(3) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

(4) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.

(5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(1) Appropriate application techniques.
(2) Appropriate equipment cleaning procedures.
(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

The owner or operator shall maintain the following training records on site and available for inspection and review:

(1) A copy of the current training program.
(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

(c) Pursuant to 326 IAC 20-25-3(d), on or after January 1, 2002 the following cleaning operations for resin and gel coat application equipment shall apply:

(1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.

(2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.

(3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

(d) Pursuant to 326 IAC 20-25-7(b), on or before March 1, 2002, the owner or operator of a source subject to 326 IAC 20-25 shall submit an initial statement of compliance to the commissioner. The initial statement of compliance shall include all of the following:

(1) Name and address of the owner or operator.
(2) Address of the physical location.

(3) Statement signed by a responsible official, as set forth in 326 IAC 2-7-1(34), certifying that the source achieved compliance on or before January 1, 2002, the method used to achieve compliance, and that the source is in compliance with all the requirements of this rule.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to T039-15744-00570 and 40 CFR 52 Subpart P, the particulate matter (PM) overspray from the spray booths shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The source will be in compliance with the requirement by using dry filters at all times when the spray booths are in operation to control overspray emissions.

Pursuant to 326 IAC 6-3-2(d), the surface coating operations shall be subject to the following:

(1) The source shall operate the control device in accordance with manufacturer's specifications;

(2) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground;
(B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground;

If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1)] [40CFR 63, Subpart JJ]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and PM limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Particulate Matter (PM)

Pursuant to CP 039-2926-00179, issued on April 19, 1995, the dry filters for PM control shall be in operation at all times when the paint booths are in operation.

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.1(a), the Permittee shall maintain records in accordance with (A) through (C) below. Records maintained for (A) through (C) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1(a).

For VOC emissions from the fiberglass manufacturing facility (Buildings 14, 15 and 16):

(A) The cleanup solvent usage for each month.
(B) The total VOC usage for each month.
(C) The weight of VOCs emitted for each compliance period.

(b) Pursuant to 326 IAC 20-25-6, on and after January 1, 2002, the permittee shall maintain records that are complete and sufficient to establish compliance with the requirements in 326 IAC 20-25, such as: (1) Purchase orders. (2) Invoices. (3) Material safety data sheets (MSDS). (4) Manufacturer's certified product data sheets. (5) Calculations. (6) Other records to confirm compliance.

The permittee shall maintain records of all information, including all reports and notifications, in a form suitable and readily available for inspection and review. The records shall be maintained for at least five (5) years following the date of each occurrence, measurement, or record. At a minimum, the most recent two (2) years of data shall be retained on site. The remaining three (3) years of data may be retained off-site.

(c) Pursuant to 326 IAC 20-25-5, compliance with the HAP monomer content and usage limitations in Condition D.1.1 shall be determined using one (1) of the following:

(1) The manufacturer's certified product data sheet.

(2) The manufacturer's material safety data sheet.

(3) Sampling and analysis, using one of the following test methods, as applicable:

(A) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins and gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.

(B) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.

(C) Upon written application by the source, the commissioner may approve an alternative test method.

When a MSDS, a certified product data sheet, or other document specifies a range of values, the values resulting in the greatest calculated emissions shall be used for determining compliance with this rule.

(b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Orbit Composites, Inc. and Better Way Products, Inc.
Source Address: 210 Wabash Street, Millersburg, IN 46543
Mailing Address: 70891 County Road 23, New Paris, Indiana 46553
Part 70 Permit No.: T039-15744-00570
Facility: Fiberglass Manufacturing (Buildings 14, 15 and 16)
Parameter: total VOC emissions
Limit: total VOC emissions from the following operations are limited at 8.25 tons per month:

(1) the styrene emissions and the VOC delivered to the applicators of resin and gel coating spray booths in the fiberglass manufacturing facility (Buildings 14, 15 and 16), including the catalysts and clean-up solvents.

YEAR: _____

Month	Total VOC Emissions (tons/mon)
Month 1	

Month 2	
Month 3	

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for Significant Permit Modification to Part 70 Permit

Source Name: **Orbit Composites, Inc. and Better Way Products, Inc.**
Source Location: **210 Wabash Street, Millersburg, Indiana 46543**
County: **Elkhart**
SIC Code: **3089**
Operation Permit No.: **039-15744-00570**
Permit Issuance Date: **June 26, 2002**
Permit Modification No.: **039-16519**
Permit Reviewer: **Madhurima D. Moulik**

On October 4, 2002, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Orbit Composites, Inc. and Better Way Products, Inc. had applied for a Significant Permit Modification to Part 70 Permit No. 039-15744-00570. The notice also stated that OAQ proposed to issue a Significant Permit Modification and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

After further review, IDEM, OAQ has determined that the following changes are necessary for the proposed Significant Permit Modification. The changes are as follows:

Change #1:

There was the concern that the permit modification and technical support document do not address rule 326 IAC 20-25. Rule 326 IAC 20-25 applies to this source and should be included in the permit. Therefore, the following change was made.

326 IAC 20-25 applies to sources that emit or have the potential to emit ten (10) tons per year of any HAP or twenty-five (25) tons per year of any combination of HAPs, and meet all of the following criteria:

(1) Manufacture reinforced plastics composites parts, products, or watercraft.

(2) Have an emission unit where resins and gel coats that contain styrene are applied and cured using the open molding process.

(3) Have actual emissions of styrene equal to or greater than three (3) tons per year.

Orbit Composites, Inc. and Better Way Products, Inc. meet all of the above criteria (actual emissions data from 1996, included in the Technical Support Document for the Part 70 permit No. 039-15744-00456, issued to Carriage, Inc., lists actual styrene emissions from the fiberglass operations as 11.09 tons per year). In addition, according to 326 IAC 20-25-3(e) and (f), sources meeting the following criteria are exempt from the requirements of this rule: “a source that was issued permit pursuant to 326 IAC 2 on or after June 28, 1998, but prior to the effective date of this

rule, and that obtained a revised best available control technology (BACT) determination in the permit for emission units" and/or "a new or reconstructed emission unit subject to 326 IAC 2-4.1-1". This source does not meet any of the two criteria listed above, and therefore are not exempt from the requirements of this rule.

Therefore, upon examination of the rule applicability for 326 IAC 20-25, IDEM, OAQ has determined that this rule applies to Orbit Composites, Inc. and Better Way Products, Inc. Therefore, the requirements of 326 IAC 20-25 are being included in the permit.

Change #2:

There was the concern that in Sections A.2, D.1, Buildings 14, 15, and 16 are using air-assisted airless resin laminate coating application methods. 326 IAC 20-25 requires that production resins be applied using non-atomized applicators. Also, the resin vacuum laminate coating application system in Building 16 should be referred to as "system" instead of "booth". This prompted the following changes.

326 IAC 20-25(3)(b) states that "production, specialty product resins from all sources" are required to use "mechanical non-atomized application technology or manual application". Buildings 14, 15, and 16 use production resins for manufacturing RV parts and sidewalls. Therefore, the following changes are made to Sections A.2 and D.1 (~~strikeout~~ to show deletions and **bold** to show additions):

Building 14

(1) one (1) ~~air-assisted airless~~ resin laminate coating application booth with a maximum capacity of 0.66 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F1 and F2;

(2) one (1) air-assisted airless gel coat coating application booth with a maximum capacity of 0.66 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F3 and F4;

Building 15

(3) one (1) ~~air-assisted airless~~ resin laminate coating application booth with a maximum capacity of 0.80 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F8 and F9;

(4) one (1) air-assisted airless gel coat coating application booth with a maximum capacity of 0.80 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F6 and F7;

Building 16

(5) one (1) ~~air-assisted airless~~ resin laminate coating application booth with a maximum capacity of 0.80 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F10 and F11;

(6) one (1) resin vacuum laminate coating application ~~booth~~ **system** using roll coating system with a maximum capacity of 0.80 units per hour, and exhausting through three (3) stacks, identified as F15, F16 and F17; and

Change #3:

Condition D.1.1(a) and the Quarterly Report needed to be modified to include requirements of 326 IAC 20-25.

Condition D.1.1 is modified to include emission limitations and standards, based on 326 IAC 20-25. Section D.1.2 is added to include work practice, cleaning, and training standards based on 326 IAC 20-25. Record keeping requirements in 326 IAC 20-25 are added to Section D.1.9 (re-numbered from D.1.8).

Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.1.1 Volatile Organic Compounds (VOC) ~~[326 IAC 8-6] [326 IAC 2-2]~~ **[326 IAC 20-25]**

~~The total VOC emissions from the following operations are limited at 8.25 tons per month:~~

(a) ~~the unreacted styrene ((9.5% of Resin COR 61, 27.1% of gel coat, and 14.1% of Resin 75-062) and the VOC delivered to the applicators of resin and gel coating spray booths in the fiberglass manufacturing facility (Buildings 14, 15 and 16),~~ **The total VOC emissions from the fiberglass manufacturing facilities are limited to 8.25 tons per month,** including the catalysts and clean-up solvents.

(b) Pursuant to 326 IAC 20-25-3, until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors for gel coating shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. For operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(c) Pursuant to 326 IAC 20-25-3, gel coats used shall be limited to a maximum monomer content of 44 percent (44%) by weight for clear production gel coats and 45 percent (45%) by weight for tooling gel coats, or their equivalent on an emissions mass basis. Production resin for specialty products shall be limited to a maximum monomer content of 48 percent (48 %) by weight, and tooling resin shall be limited to a maximum monomer content of 43 percent (43 %) by weight. Compliance with these monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during the month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified is sufficient for demonstrating compliance with the HAP monomer content limits.

(d) Pursuant to 326 IAC 20-25-3, the following categories of materials shall be applied using mechanical non-atomized application technology or manual application:

(1) Production non-corrosion resistant, unfilled resins.
(2) Production, specialty product resins.
(3) Tooling resins used in the manufacture of watercraft.
(4) Production resins used for Class I flame and smoke product.

All other gel coat application and mechanical application of resins shall be by any of the following spray technologies:

(1) Non-atomized application technology.
(2) Air-assisted airless.
(3) Airless.

(4) High volume, low pressure.
(5) Equivalent emission reduction technologies to (2) through (4).

(e) The work practice, cleaning, and training standards required pursuant to 326 IAC 20-25 as specified in Condition D.1.2 shall be followed.

D.1.2 Styrene [326 IAC 20-25]

The following shall apply to the reinforced plastic composites open molding process:

(a) Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

(1) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.

(2) Except for mixing containers as described in item (7), HAP containing materials shall be kept in a closed container when not in use.

(3) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.

(4) Solvent collection containers shall be kept closed when not in use.

(5) Clean-up rags with solvent shall be stored in closed containers.

(6) Closed containers shall be used for the storage of the following:

(A) All production and tooling resins that contain HAPs.
(B) All production and tooling gel coats that contain HAPs.
(C) Waste resins and gel coats that contain HAPs.
(D) Cleaning materials, including waste cleaning materials.
(E) Other materials that contain HAPs.

(7) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

(b) Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

(1) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.

(2) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.

(3) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

(4) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.

(5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(1) Appropriate application techniques.
(2) Appropriate equipment cleaning procedures.

(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

The owner or operator shall maintain the following training records on site and available for inspection and review:

(1) A copy of the current training program.
(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

(c) Pursuant to 326 IAC 20-25-3(d), on or after January 1, 2002 the following cleaning operations for resin and gel coat application equipment shall apply:

(1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.

(2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.

(3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

(d) Pursuant to 326 IAC 20-25-7(b), on or before March 1, 2002, the owner or operator of a source subject to 326 IAC 20-25 shall submit an initial statement of compliance to the commissioner. The initial statement of compliance shall include all of the following:

(1) Name and address of the owner or operator.
(2) Address of the physical location.

(3) Statement signed by a responsible official, as set forth in 326 IAC 2-7-1(34), certifying that the source achieved compliance on or before January 1, 2002, the method used to achieve compliance, and that the source is in compliance with all the requirements of this rule.

The following changes were made to the Part 70 Quarterly Report:

Part 70 Quarterly Report

Source Name:	Orbit Composites, Inc. and Better Way Products, Inc.
Source Address:	210 Wabash Street, Millersburg, IN 46543
Mailing Address:	70891 County Road 23, New Paris, Indiana 46553
Part 70 Permit No.:	T039-15744-00570
Facility:	~~Plant #2~~ Fiberglass Manufacturing: (Buildings 14, 15 and 16)~~, and Buildings 7 and 17A of Plant #1~~
Parameter:	total VOC emissions
Limit:	total VOC emissions from the **fiberglass manufacturing facility (Buildings 14, 15, and 16)** ~~following operations~~ are limited at 8.25 tons per month,
	~~(1) the unreacted styrene (9.5% of Resin COR 61, 27.1% of gel coat, and 14.1% of Resin 75-062) and the VOC delivered to the applicators of resin and gel coating spray booths in Plant #2 (Buildings 14, 15 and 16),~~ including the catalysts and clean-up solvents.

Change #4:

Condition D.1.2 (re-numbered to D.1.3) would be modified as follows: The source will be in compliance with the requirement by using ~~air~~ **dry** filters at all times when the spray booths are in operation to control overspray emissions.

Change #5:

Condition D.1.6 (re-numbered to D.1.7) would be modified as follows:

D.1.~~6~~**7** Particulate Matter (PM)

Pursuant to CP 039-2926-00179, issued on April 19, 1995, the ~~air~~ **dry** filters for PM control shall be in operation at all times when the ~~paint~~ booths are in operation.

Change #6:

Condition D.1.8 (re-numbered to D.1.9), would be modified for fiberglass operations.

The following changes are made to the record keeping requirements pursuant to 326 IAC 20-25.

D.1.~~8~~ **9** Record Keeping Requirements

(a) To document compliance with Condition D.1.1**(a)**, the Permittee shall maintain records in accordance with (A) through (~~E~~ **C**) below. Records maintained for (A) through (~~E~~ **C**) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1**(a)**.

For VOC emissions **from the fiberglass manufacturing facility** ~~of Plant #2~~ (Building 14, 15 and 16) ~~and Buildings 7 and 17~~:

~~(A) A log of the dates of use;~~
~~(B) The volume weighted VOC content of the coatings used for each month.~~
(**A** ~~C~~) The cleanup solvent usage for each month.
(**B** ~~D~~) The total VOC usage for each month.
(~~E~~ **C**) The weight of VOCs emitted for each compliance period.

(b) Pursuant to 326 IAC 20-25-6, on and after January 1, 2002, the permittee shall maintain records that are complete and sufficient to establish compliance with the requirements in 326 IAC 20-25, such as: (1) Purchase orders. (2) Invoices. (3) Material safety data sheets (MSDS). (4) Manufacturer's certified product data sheets. (5) Calculations. (6) Other records to confirm compliance.

The permittee shall maintain records of all information, including all reports and notifications, in a form suitable and readily available for inspection and review. The records shall be maintained for at least five (5) years following the date of each occurrence, measurement, or record. At a minimum, the most recent two (2) years of data shall be retained on site. The remaining three (3) years of data may be retained off-site.

(e) Pursuant to 326 IAC 20-25-5, compliance with the HAP monomer content and usage limitations in Condition D.1.1 shall be determined using one (1) of the following:

(1) The manufacturer's certified product data sheet.

(2) The manufacturer's material safety data sheet.

(3) Sampling and analysis, using one of the following test methods, as applicable:

(A) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins and gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.

(B) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.

(C) Upon written application by the source, the commissioner may approve an alternative test method.

When a MSDS, a certified product data sheet, or other document specifies a range of values, the values resulting in the greatest calculated emissions shall be used for determining compliance with this rule.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	**Orbit Composites, Inc. and Better Way Products, Inc.**
Source Location:	**210 Wabash Street, Millersburg, Indiana 46543**
County:	**Elkhart**
SIC Code:	**3089**
Operation Permit No.:	**039-15744-00570**
Permit Issuance Date:	**June 26, 2002**
Permit Modification No.:	**039-16519**
Permit Reviewer:	**Madhurima D. Moulik**

The Office of Air Quality (OAQ) has reviewed a modification application from Orbit Composites, Inc. and Better Way Products, Inc. relating to the operation of a recreational vehicle (RV) and Class C motor home manufacturing plant.

History

In March 2002, Orbit Composites, Inc. and Better Way Products, Inc. entered into an agreement with Carriage, Inc., to take operational control of equipment for producing fiberglass reinforced plastic products. The Part 70 permit for Carriage, Inc. (No. T039-6326-00456) was administratively amended on June 12, 2002 (Administrative Amendment No. 039-15544-00456), to process this transfer of operational control. In addition, a new Title V (No. T039-15744-00570) was issued to Orbit Composites, Inc. and Better Way Products, Inc. on June 26, 2002. Since then, Orbit Composites, Inc. and Better Way Products, Inc. have purchased the equipment, and thus assumed ownership of the fiberglass operation. On August 29, 2002, an application was received from Orbit Composites, Inc. and Better Way Products, Inc., to process the transfer of ownership of the fiberglass operation. The application requested that all references to equipment at Carriage Inc. be deleted from the permit issued to Orbit Composites, Inc. and Better Way Products, Inc. and vice versa.

Permitted Emission Units and Pollution Control Equipment

Building 14

(1) one (1) air-assisted airless resin laminate coating application booth with a maximum capacity of 0.66 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F3 and F4;

(2) one (1) air-assisted airless gel coat coating application booth with a maximum capacity of 0.66 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F1 and F2;

Building 15

(3) one (1) air-assisted airless resin laminate coating application booth with a maximum capacity of 0.80 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F6 and F7;

(4) one (1) air-assisted airless gel coat coating application booth with a maximum capacity of 0.80 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F8 and F9;

Building 16

(5) one (1) air-assisted airless resin laminate coating application booth with a maximum capacity of 0.80 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F12 and F13;

(6) one (1) resin vacuum laminate coating application booth using roll coating system with a maximum capacity of 0.80 units per hour, and exhausting through two (2) stacks, identified as F14 and F15; and

(7) one (1) air-assisted airless gel coat coating application booth with a maximum capacity of 0.80 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F10 and F11.

Insignificant Activities

(8) seven (7) heaters with a total rated capacity of 3.51 mmBtu/hr.

Source Definition

As noted above, Orbit Composites, Inc. and Better Way Products, Inc. are operating equipment in a Carriage, Inc. building. Orbit composites, Inc. and Better Way Products, Inc. are one source, which owns and operates a fiberglass manufacturing plant. Carriage Inc. is a separate source, which owns and operates an automotive manufacturing plant. The two sources do not have the same two-digit SIC, which are 30 and 37, respectively. One source, Orbit Composites and Better Way Products, supplies 5 - 10 % of their output to the other, Carriage, Inc.. This is not enough support for Orbit Composites and Better Way Products to be considered a support facility. The sources are located on the same property.

Based upon this information, the sources are determined to be separate sources.

Justification for the Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification. The changes requested involve changes in the emission limit specified in the Part 70 permit. According to 326 IAC 2-7-12(b)(C)(i), a Minor Permit Modification cannot be used for changes that “change a case-by-case determination of an emission limit or other standard”. Therefore, pursuant to 326 IAC 2-7-12(d)(1), a Significant Permit Modification is used to process the changes that “do not qualify as Minor Permit Modifications”.

Existing Approvals

The source was issued a Part 70 Operating Permit No. T 039-15744-00570 on June 26, 2002.

The source had earlier been operating under the following approvals:

(1) CP 039-2926-00179, issued on April 19, 1995.

In addition, the emission units at this facility were part of Carriage, Inc. before Orbit Composites, Inc. and Better Way Products, Inc. assumed ownership, and were included in Part 70 No. T039-6326-00456, issued to Carriage, Inc. on June 12, 1999.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on August 29, 2002.

Potential To Emit of the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	118.2
PM-10	118.2
SO_2	-
VOC	184.1
CO	0.3
NO_x	2.2

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Worst Single HAP (Styrene)	49.7
TOTAL HAPs	55.6

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Fiberglass Operations	3.6	3.6	-	99	0.3	2.2	49.7 (worst)
Total Emissions	3.6	3.6	-	99	0.3	2.2	55.6

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as maintenance for ozone.

(b) Elkhart County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration, PSD) and 40 CFR 52.21

This source is not subject to the requirements of 326 IAC 2-2 (PSD), because the potential to emit of all regulated pollutant emissions is less than 250 tons per year and it is not one of the 28 listed source categories. Therefore, the requirements of 326 IAC 2-2 and 40 CFR 52.21 do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Elkhart County and has the potential to emit more than 10 tons per year of VOCs. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (HAPs Major Sources: New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1, any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). Although the spray booths in each of Buildings 14, 15, 16 have a PTE more than 10 tons per year of a single HAP, these booths were constructed before the rule applicability date of July 27, 1997. Therefore, these paint booths are not subject to the requirements of 326 IAC 2-4.1.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The emission units at the fiberglass plant are not subject to 326 IAC 8-1-6, since they were all constructed before the January 1, 1980, applicability date for this rule.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 4, 1974 and prior to January 1,

1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. The total VOC emissions from the fiberglass manufacturing facility is limited to 99 tons per year.

Therefore, 326 IAC 8-6 does not apply.

326 IAC 6-3-2 (Process Operations)

The surface coating operations at this facility are subject to 326 IAC 6-3-2, since the coating processes used are not dip, flow, or brush coating (which are exempt from this rule), and the amount used is more than five (5) gallons per day.

Pursuant to T039-15744-00570 and 40 CFR 52 Subpart P, the particulate matter (PM) overspray from the spray booths in Buildings 14, 15, and 16 shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The source will be in compliance with the requirement by using air filters at all times to control overspray emissions when these spray booths are in operation.

Pursuant to 326 IAC 6-3-2(d), the surface coating operations shall be subject to the following:

(1) The source shall operate the control device in accordance with manufacturer's specifications;
(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  (A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground;
  (B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground;

If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D

of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(1) VOC emissions from Buildings 14, 15, and 16 have applicable compliance monitoring conditions as specified below:

(a) the total VOC emissions from the following operations are limited at 99 tons per year:

(A) the unreacted styrene (11% of strene in Resin COR 61, 30% of styrene in the gel coat, and 6% of styrene in Resin 75-062) and the VOC delivered to the applicators of resin and gel coating spray booths in Buildings 14, 15 and 16, including the catalysts and clean-up solvents.

These monitoring conditions are necessary to avoid the requirements of 326 IAC 8-6 and 326 IAC 2-2.

Conclusion

This permit modification shall be subject to the conditions of the attached Part 70 Significant Permit Modification No. 039-16519-00570.

CHANGES TO THE PART 70 PERMIT

These are the changes to the Part 70 Permit (~~strikeout~~ to show deletions and **bold** to show additions):

(1) Section A.2 and A.3 are modified as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices in ~~Carriage, Inc. (Plant #1) and~~ Orbit Composites, Inc. and Better Way Products, Inc. ~~(Plant #2)~~:

~~Carriage, Inc. (Plant #1)~~

~~Building 8~~

~~(1) one (1) airless paint spray booth with a maximum capacity of 0.5 units per hour, using dry filters as overspray particulate matter control, and exhausting through one (1) stack, identified as #92;~~

~~Building 12~~

~~(2) one (1) airless counter top assembly adhesive spray booth, with a maximum capacity of coating 10 units per hour, using dry filters as overspray particulate matter control, and exhausting through two (2) stacks, identified as #90 and #91;~~

~~Building 17A~~

~~(3) one (1) high pressure air-assisted paint spray booth, capable of coating 2.0 units of metal frame per hour, using dry filter banks as overspray particulate matter~~

~~control and exhausting at one (1) stack, identified as 17A;~~

~~(4) miscellaneous VOC containing aerosol spray adhesives and handwipe solvents with following maximum coating rates:~~

~~a) 0.25 units per hour in Building 3;~~
~~(b) 0.25 units per hour in Building 5;~~
~~(c) 0.75 units per hour in Building 7;~~
~~(d) 0.25 units per hour in Building 9;~~
~~(e) 0.25 units per hour in Building 22; and~~

~~(5) one (1) wood waste fired boiler in Building 20, with a fuel consumption rate of 750 pounds per hour and a rated capacity of 4.0 mmBtu/hr, equipped with a single 42" diameter cyclone for particulate matter emission control, and exhausting through one (1) stack, identified as #20.~~

Orbit Composites, Inc. and Better Way Products, Inc. ~~(Plant #2)~~

Building 14
(1) one (1) air-assisted airless resin laminate coating application booth with a maximum capacity of 0.66 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F1 and F2;

(2) one (1) air-assisted airless gel coat coating application booth with a maximum capacity of 0.66 units per hour, using a tandem dry filter as overspray particulate matter control, and exhausting through two (2) stacks, identified as F3 and F4;

....

A.3 ~~Specifically Regulated~~ Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities ~~which are specifically regulated~~, as defined in 326 IAC 2-7-1(21):

(1) three (3) natural gas-fired make-up air units ~~in Plant #2~~, identified as H1A, H2A and H3A, each with a heat input rate of 3.025, 3.025 and 3.85 mmBtu/hr, respectively.

(2) The facility description in Section D.1 is modified as follows:

Facility Description [326 IAC 2-7-5(15)]

Orbit Composites, Inc. and Better Way Products, Inc. ~~(Plant #2)~~

(3) Condition D.1.1 is modified as follows:

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-6] [326 IAC 2-2]

The total VOC emissions from the following operations are limited at 8.25 tons per month:

~~(a)~~ the unreacted styrene ((9.5% of Resin COR 61, 27.1% of gel coat, and 14.1% of Resin 75-062) and the VOC delivered to the applicators of resin and gel coating spray booths in the **fiberglass manufacturing facility** ~~Plant #2~~ (Buildings 14, 15 and 16), including the catalysts and clean-up solvents.

~~(b) the VOC delivered to the applicators in Buildings 7 and 17A of Plant #1, including clean-up~~

~~solvents.~~

(4) Condition D.1.2 is modified as follows:

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to **T039-15744-00570 and 40 CFR 52 Subpart P**, ~~326 IAC 6-3-2 (Process Operations)~~, the particulate matter (PM) overspray from the spray booths shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The source will be in compliance with the requirement by using air filters at all times when the spray booths are in operation to control overspray emissions. ~~The PM emission control will limit source wide potential PM emissions to less than 249 tons per year and, therefore, render 326 IAC 2-2 not applicable.~~

Pursuant to 326 IAC 6-3-2(d), the surface coating operations shall be subject to the following:

(1) The source shall operate the control device in accordance with manufacturer's specifications;

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground;

(B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground;

If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

(5) Condition D.1.6 is modified as follows:

D.1.6 Particulate Matter (PM)

Pursuant to CP 039-2926-00179, issued on April 19, 1995, ~~CP-039-4712-00205, issued on February 20, 1996, and CP-039-8817-00456, issued on September 26, 1997,~~ the air filters for PM control shall be in operation at all times when the paint booths are in operation.

(6) Condition D.1.8 is modified as follows:

D.1.8 Record Keeping Requirements

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(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (A) through (~~E~~ **C**) below. Records maintained for (A) through (~~E~~ **C**) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1.

For VOC emissions **from the fiberglass manufacturing facility** ~~of Plant #2~~ (Building 14, 15 and 16) ~~and Buildings 7 and 17~~:

~~(A) A log of the dates of use;~~
~~(B) The volume weighted VOC content of the coatings used for each month.~~
(**A** ~~C~~) The cleanup solvent usage for each month.
(**B** ~~D~~) The total VOC usage for each month.
(~~E~~ **C**) The weight of VOCs emitted for each compliance period.

(7) The Quarterly Report form is modified as follows:

Part 70 Quarterly Report

Source Name:	Orbit Composites, Inc. and Better Way Products, Inc.
Source Address:	210 Wabash Street, Millersburg, IN 46543
Mailing Address:	70891 County Road 23, New Paris, Indiana 46553
Part 70 Permit No.:	T039-15744-00570
Facility:	~~Plant #2~~ Fiberglass Manufacturing: (Buildings 14, 15 and 16)~~, and Buildings 7 and 17A of Plant #1~~
Parameter:	total VOC emissions
Limit:	total VOC emissions from the following operations are limited at 8.25 tons per month:

(1) the unreacted styrene (9.5% of Resin COR 61, 27.1% of gel coat, and 14.1% of Resin 75-062) and the VOC delivered to the applicators of resin and gel coating spray booths in **the fiberglass manufacturing facility** ~~Plant #2~~ (Buildings 14, 15 and 16), including the catalysts and clean-up solvents.

~~(2) the VOC delivered to the applicators in Buildings 7 and 17A of Plant #1, including clean-up solvents.~~